

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X
Leon D. Borochoff, on behalf of himself and all
other similarly situated,

Plaintiff,

v.

GLAXOSMITHKLINE PLC, Dr. Jean-Pierre
Garnier, and Julian Heslop,

Defendants.
-----X

: CIVIL ACTION

: NO. 07-CIV-5574

NOTICE OF MOTION TO ADMIT COUNSEL PRO HAC VICE

TO: GRANT & EISENHOFER P.A.
Jay W. Eisenhofer (JE-5503)
Sidney S. Liebesman (SL-8444)
485 Lexington Avenue
29th Floor
New York, NY 10017

KAPLAN FOX & KILSHEIMER LLP
Frederic S. Fox
Joel B. Strauss
Donald R. Hall
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Ann K. Ritter
P.O. Box 1782 (29465)
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Mount Pleasant, SC 29465

GLOBAL EXPANSION GROUP
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Bank of America Tower at International Pl.
100 SE Second Street, Suite 2610
Miami, FL 33131

STURMAN LLC
Deborah Sturman
112 Madison Avenue
7th Floor
New York, NY 10016

LERACH COUGHLIN STOIA GELLER
RUDMAN & ROBBINS LLP
David A. Rosenfeld
Samuel H. Rudman
58 South Service Road, Suite 200
Melville, NY 11747

PLEASE TAKE NOTICE that, upon the annexed Affirmation in support of this
motion and the Certificates of Good Standing annexed thereto, we will move this Court before

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FILED
U.S. DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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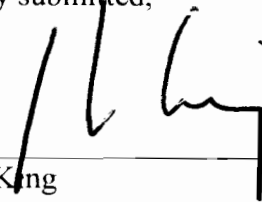
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the Honorable Louis L. Stanton at the United States District Courthouse for the Southern District of New York, pursuant to Rule 1.3 (c) of the Local Rules of the United States District Courts for the Southern and Eastern Districts of New York, for an Order allowing the admission of Michael E. Baughman, a member of the law firm of Pepper Hamilton LLP and a member in good standing of the Bars of the Commonwealth of Pennsylvania and State of New Jersey, as attorney to the bar of this Court *pro hac vice* to argue or try this case in whole or in part as counsel. There are no pending disciplinary proceedings against Mr. Baughman in any state or federal court.

Dated: New York, New York
September 21, 2007

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'K. King', is written over a horizontal line.

Kenneth J. King
PEPPER HAMILTON LLP
420 Lexington Avenue
Suite 2320
New York, NY 10170-2399
kingk@pepperlaw.com
(212) 808-2700

Attorneys for Defendants

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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Leon D. Borochoff, on behalf of himself and all	: CIVIL ACTION
other similarly situated,	:
	:
Plaintiff,	:
v.	: NO. 07-CIV-5574
	:
	:
GLAXOSMITHKLINE PLC, Dr. Jean-Pierre	:
Garnier, and Julian Heslop,	:
	:
Defendants.	:
-----X	

**AFFIRMATION OF KENNETH J. KING
IN SUPPORT OF MOTION TO ADMIT COUNSEL *PRO HAC VICE***

[illegible]

KENNETH J. KING, being duly sworn, hereby deposes and says as follows:

1. I am an attorney admitted to practice in the State of New York. I am a partner with the law firm of Pepper Hamilton LLP, counsel for defendants in the above-captioned matter.

2. I make this Affirmation in support of the motion for the admission of Michael E. Baughman to practice *pro hac vice* in the above-captioned matter.

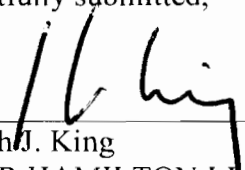
3. Mr. Baughman is a partner with the law firm of Pepper Hamilton LLP. As shown in the Certificates of Good Standing annexed to his Affidavit appended hereto, Mr. Baughman is a member in good standing of the Bar of the Commonwealth of Pennsylvania and the State of New Jersey.

4. There are no pending disciplinary proceedings against Mr. Baughman in any State or Federal court.

5. It is respectfully requested that the Court grant the motion for an order permitting Michael E. Baughman to appear in this action as counsel for defendants for all purposes *pro hac vice*. A proposed order for Mr. Baughman's admission *pro hac vice* is appended hereto.

Dated: New York, New York
September 21, 2007

Respectfully submitted,



Kenneth J. King
PEPPER HAMILTON LLP
420 Lexington Avenue
Suite 2320
New York, NY 10170-2399
kingk@pepperlaw.com
(212) 808-2700

Attorneys for Defendants

Sworn to before me this
21st day of September, 2007



Notary Public

MICHAEL PALITZ
Notary Public, State of New York
No. 01PA6133474
Qualified in Westchester County
Commission Expires 9/19/2009

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

Leon D. Borochoff, on behalf of himself and all other similarly situated,	:	CIVIL ACTION
	:	
	:	
Plaintiff,	:	
v.	:	NO. 07-CIV-5574
	:	
	:	
GLAXOSMITHKLINE PLC, Dr. Jean-Pierre Garnier, and Julian Heslop,	:	
	:	
	:	
Defendants.	:	

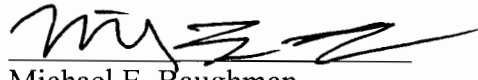
**AFFIDAVIT OF MICHAEL E. BAUGHMAN
IN SUPPORT OF MOTION TO ADMIT COUNSEL PRO HAC VICE**

COMMONWEALTH OF PENNSYLVANIA)	
)	ss:
COUNTY OF PHILADELPHIA)	

MICHAEL E. BAUGHMAN, being duly sworn, hereby deposes and says:

1. I am a partner with the law firm of Pepper Hamilton LLP, 3000 Two Logan Square, Eighteenth and Arch Streets, Philadelphia, PA 19103.
2. I make this Affidavit in support of the motion for my admission to practice *pro hac vice* in the above-captioned matter.
3. As shown in the Certificate of Good Standing annexed hereto I am a member in good standing of the Bar of the Commonwealth of Pennsylvania and the State of New Jersey.
4. There are no pending disciplinary proceedings against me in any state or federal court.

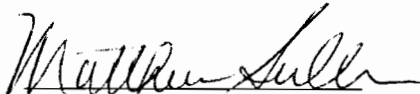
5. Wherefore your affiant respectfully submits that she be permitted to appear as counsel and advocate *pro hac vice* in this one case.



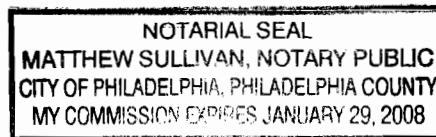
Michael E. Baughman
PEPPER HAMILTON LLP
3000 Two Logan Square
Eighteenth and Arch Streets
Philadelphia, PA 19103-2799
baughmam@pepperlaw.com
(215) 981-4000
Attorneys for Defendants

Dated: September 19, 2007

Sworn to before me this
19th day of September, 2007



Notary Public



Supreme Court of New Jersey

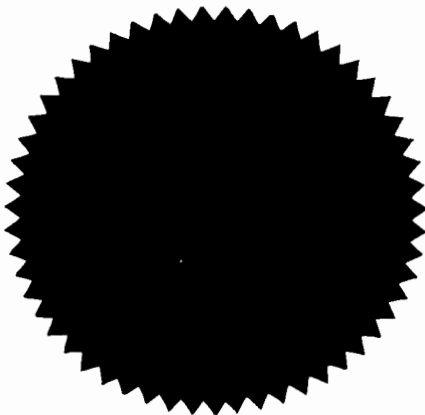


Certificate of Good Standing

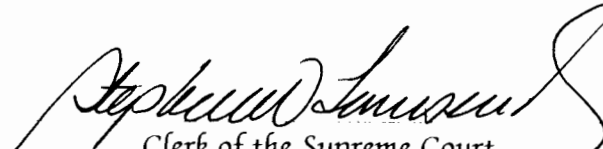
This is to certify that **MICHAEL EDWARD BAUGHMAN**
(No. **019811996**) was constituted and appointed an Attorney at Law of New
Jersey on **January 15, 1997** and, as such,
has been admitted to practice before the Supreme Court and all other courts of this State
as an Attorney at Law, according to its laws, rules, and customs.

I further certify that as of this date, the above-named is an Attorney at Law in
Good Standing. For the purpose of this Certificate, an attorney is in "Good Standing"
if the Court's records reflect that the attorney: 1) is current with all assessments
imposed as a part of the filing of the annual Attorney Registration Statement, including,
but not limited to, all obligations to the New Jersey Lawyers' Fund for Client
Protection; 2) is not suspended or disbarred from the practice of law; 3) has not
resigned from the Bar of this State; and 4) has not been transferred to Disability
Inactive status pursuant to Rule 1:20-12.

*Please note that this Certificate does not constitute confirmation of an attorney's
satisfaction of the administrative requirements of Rule 1:21-1(a) for eligibility to
practice law in this State.*



In testimony whereof, I have
hereunto set my hand and
affixed the Seal of the
Supreme Court, at Trenton, this
17TH day of **September** , 20 **07**


Clerk of the Supreme Court



Supreme Court of Pennsylvania

CERTIFICATE OF GOOD STANDING

Michael E. Baughman, Esq.

DATE OF ADMISSION

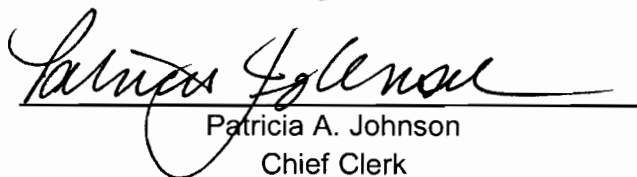
December 12, 1996

The above named attorney was duly admitted to the bar of the Commonwealth of Pennsylvania, and is now a qualified member in good standing.



Witness my hand and official seal

Dated: August 22, 2007


Patricia A. Johnson
Chief Clerk

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

Leon D. Borochoff, on behalf of himself and all
other similarly situated,

Plaintiff,

V.

GLAXOSMITHKLINE PLC, Dr. Jean-Pierre
Garnier, and Julian Heslop,

Defendants.

[illegible]

The undersigned, being duly sworn, deposes and says that she is over the age of 18 years, and is not a party to this action.

That, on the 21st day of September, 2007, she caused to be served the within NOTICE OF MOTION TO ADMIT COUNSEL *PRO HAC VICE*, AFFIDAVIT OF MICHAEL E. BAUGHMAN IN SUPPORT OF MOTION TO ADMIT COUNSEL *PRO HAC VICE*, and the AFFIRMATION OF KENNETH J. KING IN SUPPORT OF MOTION TO ADMIT COUNSEL *PRO HAC VICE*, by first class mail upon:

GRANT & EISENHOFER P.A.
Jay W. Eisenhofer (JE-5503)
Sidney S. Liebesman (SL-8444)
485 Lexington Avenue
29th Floor
New York, NY 10017

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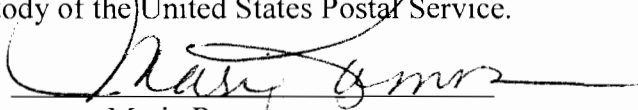
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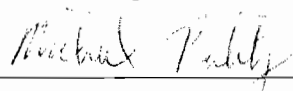
STURMAN LLC
Deborah Sturman
112 Madison Avenue
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New York, NY 10016

LERACH COUGHLIN STOIA GELLER
RUDMAN & ROBBINS LLP
David A. Rosenfeld
Samuel H. Rudman
58 South Service Road, Suite 200
Melville, NY 11747

the addresses having been designated by said attorneys for that purpose, by depositing a true copy of same, securely enclosed in a postpaid properly addressed wrapper, in an official depository under the exclusive care and custody of the United States Postal Service.


Marie Ramos

Sworn to before me this
21st day of September, 2007



Notary Public

MICHAEL PALITZ
Notary Public, State of New York
No. 01PA6133474
Qualified in Westchester County
Commission Expires 9/19/2009